

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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IN RE:	:	
Keith B. Kratzke	:	Chapter 13
Janet C. Kratzke	:	Case No.: 20-13076-ELF
Debtor(s)	:	

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**EXPEDITED MOTION FOR AUTHORITY TO SELL REAL PROPERTY**

Debtors, Keith B. and Janet C. Kratzke, by and through their undersigned counsel bring this Motion to Sell Real Property under Eastern District of Pennsylvania Local Rule 6004-1 and Section 363 of the United States Bankruptcy Code; and in support thereof aver the following:

1. Debtors commenced the instant Chapter 13 matter on July 22, 2020 by filing a Voluntary Petition.
2. The Chapter 13 Plan was confirmed on March 24, 2021.
3. The subject real property is located at 379 Pine Run Road, Doylestown, PA 18901 (hereinafter referred to as “the property”) and is owned by the Debtors.
4. On or about September 6 2022, the Debtors, by and through their realtor, entered into an Agreement of Sale of the property in the amount of \$684,000. A true and correct copy of the Agreement of Sale is attached hereto and labeled as **Exhibit “A.”**
5. The settlement date for the sale of the subject property is scheduled for October 12, 2022.
6. Due to the upcoming sale date the debtors are requesting an Expedited Hearing on this Motion.

7. The Buyers, Mitchell Diodato, Jr, and Julie Thomas, are not insiders of the Debtors and the sale represents an arms-length transaction between the parties made without fraud and/or collusion.

8. From the sale proceeds, Debtors intend to satisfy the mortgage(s) held by Wilmington Trust and Wells Fargo, along with any other liens on the property.

9. Debtors are desirous of receiving their full exemption in the sum of up to \$50,300 plus any remaining proceeds after all liens and the entire Chapter 13 Balance is satisfied.

**WHEREFORE**, Debtors respectfully request that this Honorable Court enter an Order: (i) Granting this Motion, (ii) Authorizing the debtors to sell the property to the proposed buyer under the terms of that Agreement for the Sale of Real Estate free and clear of liens, claims interests and encumbrances, and, (iii) Granting the debtors such other and further relief to which they may be justly entitled.

Dated: September 22, 2022

/s/Brad J. Sadek, Esq  
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